

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12512-RWZ

CHRISTOPHER CAVALLARO,  
Plaintiff,

v.

PERFORMANCE MARINE ASSOCIATES  
INSURANCE SERVICES, INC. and ACE GROUP,  
Defendants.

**MOTION FOR *PRO HAC VICE* ADMISSION OF  
MARK A. HRUSKA, ESQ.**

The defendant, Performance Marine Associates Insurance Services, Inc., by and through undersigned counsel, respectfully moves this Court, pursuant to Local Rule 83.5.3, to permit Mark A. Hruska, Esq., to appear as its attorney in the above-captioned action.

In support of this Motion, the defendant states as follows:

1. Mr. Hruska is a practicing attorney with offices located in Boca Raton, Florida. He is a member in good standing with the Florida bar and in all other jurisdictions in which he is admitted. (See Certificate of Mark A. Hruska, Esq., attached hereto).

2. Local Rule 83.5.3 states that a member of the bar, in good standing, of another United States District Court or of the highest court of any state may appear before the United States District Court for the District of Massachusetts upon the filing of a Certificate in compliance with Local Rule 83.5.3(b), and provided further such application for leave to practice in this Court is on Motion of a member of the bar of this Court.

3. Undersigned counsel is a member in good standing of the bar of this Court.

Moreover, undersigned counsel has entered his appearance in this action and shall continue to represent the defendant, Performance Marine Associates Insurance Services, Inc., throughout the pendency of this action.

Respectfully submitted,

The Defendant,  
PERFORMANCE MARINE ASSOCIATES  
INSURANCE SERVICES, INC.,  
By its attorneys,



John J. Davis, Esq., BBO #115890  
**PIERCE, DAVIS & PERRITANO, LLP**  
Ten Winthrop Square  
Boston, Massachusetts 02110  
Tel. 617-350-0950

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the foregoing have been furnished via ✓ U.S. mail, \_\_\_\_\_ facsimile or \_\_\_\_\_ hand delivery, to: Mark A. Hruska, Esq., Schwartz & Horwitz, P.A., 3301 NW Boca Raton Boulevard, Suite 200, Boca Raton, FL 33431; Stephen L. D'Angelo, Esq., D'Angelo & Hashem, LLC, 6 Beacon Street, Suite 505, Boston, MA 02108; and David J. Farrell, Jr., 2355 Main Street, S. Chatham, MA 02659, this \_\_\_\_\_ day of January, 2005.



John J. Davis, Esq.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12512-RWZ

CHRISTOPHER CAVALLARO,  
Plaintiff,

v.

PERFORMANCE MARINE ASSOCIATES  
~~INSURANCE SERVICES, INC.~~ and ACE GROUP,  
Defendants.

**CERTIFICATE OF MARK A. HRUSKA ESQ.,**  
**IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION**

I, Mark A. Hruska, Esq., hereby submit this Certificate in support my Motion for *Pro Hac Vice* Admission under Local Rule 85.5.3(b), and further aver as follows:

1. I am over the age of 18 years, and understand the obligations of an oath. I make the following statements based on my personal knowledge.
2. I am an attorney with offices located at 3301 NW Boca Raton Blvd., Suite 200, Boca Raton, Florida 33431. I was admitted to practice law before the bar of the State of Florida in 1986. I am also admitted to practice law before the bar of the Commonwealth of Pennsylvania, the United States Court of Appeals for the Eleventh Circuit, and the United States District Court for the Districts of Florida. I am a member in good standing in every jurisdiction where I am admitted to practice.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 13<sup>th</sup> DAY OF JANUARY,  
2005.

  
\_\_\_\_\_  
MARK A. HRUSKA